

Wyoming Department of Environmental Quality  
WYPDES Waste Water Treatment Facility Inspection  
“What to Expect When You’re Inspected”



## **WASTEWATER TREATMENT FACILITY INSPECTION EXPECTATIONS**

### ***Inspection Expectations***

Wastewater treatment facilities exist in nearly all Wyoming towns and cities. Wastewater facility inspections are typically not scheduled prior to the date of the site visit. WDEQ will not make entry to a facility across private property without the approval of the land owner. Wastewater facilities are inspected every 1-3 years based upon whether the facility has been determined to be a minor or a major discharger. The classification is based upon the designed flow the facility is able to treat. Any facility which is designed to treat a million gallons a day is a major discharger and is inspected annually at a minimum. The inspection consists of two parts: a record’s review and a site inspection. Below is a summary of what occurs during both.

### ***Records Review***

A record’s inspection is a quality assurance/quality control (QA/QC) audit conducted to determine if the information being reported to the regulatory agent is correct. The discharge monitoring reports (DMRs) submitted by the permittee must accurately reflect the analytical results reported by the lab on the associated laboratory reports and/or bench sheets. The audit also ensures that samples were collected and analyzed utilizing standard methods to produce reliable results.

The inspector will request an audit for approximately the last year of documentation. Documents necessary to maintaining compliance with the WYPDES permit must be maintained on site or at the nearest local field office for a minimum of three years from creation. All records must be made available to DEQ staff upon request:

1. Determine if discharge has occurred since the previous inspection.
2. If discharge has occurred, the facility’s DMRs are reviewed for accuracy. The DMRs are compared to the laboratory analytical reports and the field sheets containing information such as pH, temperature, chlorine readings and discharge rates. At this time it is also determined that samples are being collected at the proper frequency, geometric means are calculated and reported correctly. Chain of custody forms are reviewed to ensure holding times and receipt temperatures for samples is adequate.
3. Whole Effluent Toxicity (WET) analytical results, if applicable, are also reviewed for compliance with the WYPDES permit.
4. If there are time intervals in which a discharge has not occurred, the DMRs will be checked to ensure they were still submitted to WDEQ but with ‘No Discharge’ indicated.
5. WDEQ will confirm that the permitted facility has a current copy of their permit on hand. Also, pH meter calibration sheets will be reviewed to confirm that these meters are being calibrated prior to the collection of pH data. The pH calibration buffer solution expiration dates will also be reviewed to ensure they have not expired.

6. Temperatures of ovens, incubators and refrigerators are inspected for compliance.
7. Operation and maintenance (O&M) manuals are checked to ensure they are current to the facilities operation.
8. Documentation of sanitary sewer overflows (SSOs) will also be confirmed to ensure that any SSOs have been reported to the state.
9. Any other concerns or issues that may have been encountered since the previous inspection will be reviewed at this time.

#### *Common Compliance Issues Encountered During Record's Reviews*

1. Inability to provide pH meter calibration data.
2. Field sheets not being consistently filled out.
3. Not making the contract lab fill in receipt times and temperatures for samples.
4. Sampling frequencies may not be correct.
5. Holding times for bacteria samples are exceeded.
6. Incorrect calculation of geometric mean.

#### ***Field Inspection***

Field inspections are conducted to determine compliance with permit conditions. The following list describes the type of information the inspector collects when conducting the field inspection:

1. Site inspections at wastewater treatment facilities are such that the WDEQ is nearly always escorted around the location by the facility contact. The individual outfalls, receiving channel, treatment mechanisms, flow meters, and lagoon cells (if applicable) will be visually inspected.
2. If there is a facility lab it will be inspected to make certain that the condition of the lab and the ability to run properly is not compromised by any noted deficiencies. If the outfall is discharging, a sample will be collected. The sampling event may also include collecting a duplicate sample.
3. If an automatic sampler is utilized for composite sampling, this will be inspected to ensure samples are collected at the appropriate temperature.
4. Photographs and Global Positioning System (GPS) coordinates will be collected.

#### *Common Compliance Issues Encountered During Site Inspections*

1. Analytical exceedances above the acceptable range.
2. Presence of measurable foam at the time of inspection.
3. Auto samplers not sufficiently refrigerated to 6° C or cooler.